

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROSENBAUM & ASSOCIATES, P.C.

Plaintiff,

v.

MORGAN & MORGAN a/k/a MORGAN &
MORGAN, PA, et al.

Defendants.

Civil Action No. 2:17-cv-04250-MAK

**JOINT MOTION FOR AN EXTENSION TO FILE AN ANSWER
TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendants Morgan & Morgan a/k/a Morgan & Morgan, PA, Morgan & Morgan Global, PLLC, John B. Morgan, Scott W. Weinstein, Ultima Morgan, and Reuven Moskowitz (collectively, "Defendants") and Plaintiff Rosenbaum & Associates, P.C. ("Plaintiff"), hereby move this Court for an extension to file an Answer to Plaintiff's Second Amended Complaint as set forth in the attached Stipulation being filed herewith.

Undersigned counsel for Defendants hereby attests that: (1) the content of this Motion is acceptable to the below signatories; and (2) Plaintiff's counsel has concurred with the filing of this Motion.

**PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP**

Date: April 25, 2018

By: /s/ Gaetan J. Alfano
GAETAN J. ALFANO, ESQUIRE
ERIC SOLLER, ESQUIRE
LESLIE A. MARIOTTI, ESQUIRE
BAR I.D. Nos. 32971, 65560 & 309395
1818 Market Street, Suite 3402
Philadelphia, PA 19103
(215) 320-6200
Attorneys for Defendants

MITTS LAW, LLC

By: /s/ Maurice R. Mitts
MAURICE R. MITTS, ESQUIRE
GERARD M. MCCABE, ESQUIRE
GEOFFREY PAUL HULING, ESQUIRE
JENNIFER M. ADAMS, ESQUIRE
BAR I.D. Nos. 50297, 66564, 75800 and
319377
1822 Spruce Street
Philadelphia, PA 19103
(215) 866-0110
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROSENBAUM & ASSOCIATES, P.C.

Plaintiff, Civil Action No. 2:17-cv-04250-MAK

v.

MORGAN & MORGAN a/k/a MORGAN &
MORGAN, PA, et al.

Defendants.

**STIPULATION FOR EXTENSION OF TIME TO ANSWER
PLAINTIFF'S SECOND AMENDED COMPLAINT**

The parties hereby stipulate and agree, subject to the approval of the Court under Fed. R. Civ. P. 6(b)(1)(A), that the time for Defendants Morgan & Morgan, PA, John B. Morgan, Scott W. Weinstein, Ultima Morgan, Morgan & Morgan Global, PLLC and Reuven Moskowitz to file an Answer to Plaintiff's Second Amended Complaint is extended seven (7) days through and including May 3, 2018. This extension will not affect any deadlines for dispositive motions or the trial date.

/s/ Maurice R. Mitts

Maurice R. Mitts, Esquire
Gerard M. McCabe, Esquire
Mitts Law, LLC
1822 Spruce Street
Philadelphia, PA 19103

Counsel for Plaintiff, Rosenbaum &
Associates, P.C.

/s/ Gaetan J. Alfano

Gaetan J. Alfano, Esquire
Leslie A. Mariotti, Esquire
Pietragallo Gordon Alfano Bosick
& Raspanti, LLP
1818 Market Street, Suite 3402
Philadelphia, PA 19103

Counsel for Defendants,
Morgan & Morgan, et al.

APPROVED:

HON. MARK A. KEARNEY